

From: Alter-AI-TT@simplelists.susmangodfrey.com on behalf of [Dozier, Wesley](#)
To: "Elana.NightingaleDawson@lw.com"
Cc: "Alter-AI-TT@simplelists.susmangodfrey.com"; "[OpenAICopyright](#)"; "KVPOAI@keker.com"; "openaicopyrightlitigation.lwteam@lw.com"
Subject: RE: [EXT] Authors Guild v. OpenAI - follow up on meet and confer
Date: Wednesday, August 7, 2024 12:10:16 PM

Correcting a typo in my original email:

Hi Elana—

I am responding to your email below.

Subject to reaching agreement on search terms, and in particular on adjusting downward the terms and/or altering them to add sensible modifiers, we would agree to add an additional custodian: "presidents@authorsguild.org." As of approximately 2024, this email has been used by the organization to send messages from the president and receive messages. The hit counts are likely duplicative of the multiple other custodians. Nonetheless, we are willing to add this custodian for completeness and a show of good faith.

To clarify the other points on the call:

1. Maya Lang did not have an AG address.
2. The president prior to Ms. Lang, Doug Preston, had an email address, but none of the search terms to which we agree have hits, which comports with our understanding there is no relevant material here.
3. The AG has not sent any emails from the presidents@authorsguild.org account on behalf of the interim president.

As explained earlier, no other non-staff Authors Guild title holder (i.e., President, Vice President, Secretary, etc.) has an @authorsguild.org email address.

We will also send proposed Authors Guild-specific search terms by the end of the week.

Best,
Wesley Dozier

From: Dozier, Wesley
Sent: Wednesday, August 7, 2024 9:31 AM
To: Dozier, Wesley <wdozier@lchb.com>; 'Elana.NightingaleDawson@lw.com' <Elana.NightingaleDawson@lw.com>
Cc: Alter-AI-TT@simplelists.susmangodfrey.com; OpenAICopyright <OpenAICopyright@mofo.com>; KVPOAI@keker.com; openaicopyrightlitigation.lwteam@lw.com
Subject: RE: [EXT] Authors Guild v. OpenAI - follow up on meet and confer

Resending with the correct address for the LW team.

From: Alter-AI-TT@simplelists.susmangodfrey.com <Alter-AI-TT@simplelists.susmangodfrey.com> On Behalf Of Dozier, Wesley
Sent: Wednesday, August 7, 2024 9:29 AM
To: 'Elana.NightingaleDawson@lw.com' <Elana.NightingaleDawson@lw.com>
Cc: Alter-AI-TT@simplelists.susmangodfrey.com; OpenAICopyright <OpenAICopyright@mofo.com>; 'openaicopyrightlitigation.lwteam@lw.com' <openaicopyrightlitigation.lwteam@lw.com>; KVPOAI@keker.com